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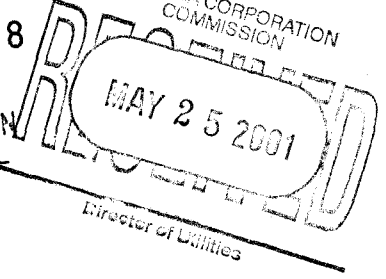
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BEFORE THE ARIZONA CORPORATION COMMISSION

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IN THE MATTER OF U S WEST
COMMUNICATIONS, INC.'S
COMPLIANCE WITH SECTION 271 OF
THE TELECOMMUNICATIONS ACT
OF 1996

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) DOCKET NO. T-00000A-97-0238
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REBUTTAL TESTIMONY OF
MICHAEL ZULEVIC
ON BEHALF OF
COVAD COMMUNICATIONS COMPANY

Arizona Corporation Commission
DOCKETED

May 24, 2001

MAY 25 2001

DOCKETED BY	
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**REBUTTAL TESTIMONY OF MICHAEL ZULEVIC ON BEHALF OF
COVAD COMMUNICATIONS COMPANY**

I. INTRODUCTION

Q. PLEASE INTRODUCE YOURSELF.

A. My name is Michael Zulevic. I am the Director of Network Deployment, Special Initiatives, for Covad Communications Company ("Covad").

Q. ARE YOU THE SAME MICHAEL ZULEVIC WHO FILED DIRECT TESTIMONY IN THIS PROCEEDING?

A. Yes, I am.

Q. MR. ZULEVIC, WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. I will be commenting on the testimony, and the attachments included with the testimony, of Qwest witness James Allen dealing with the Qwest Co-Provider Industry Change Management Process (CICMP). In addition, I will provide testimony relative to improperly rejected Local Service Requests (LSRs).

Q. WHY IS THE CICMP PROCESS RELEVANT TO THIS WORKSHOP?

A. In the course of other workshops, a number of issues were identified which require some form of change management. For example, a number of Qwest technical publications now require modification as a result of changes to the SGAT. Qwest witnesses testified that the CICMP process would be used to bring these documents into agreement with the SGAT and proposed an open

discussion of this process during the General Terms and Conditions workshop.

Q. DOES THE PRE-FILED TESTIMONY OF QWEST WITNESS JAMES ALLEN ADDRESS YOUR CONCERNS RELATIVE TO THE CICMP PROCESS?

A. No, it doesn't. Mr. Allen's testimony and attachments do explain a great deal about CICMP, but I am not assured that my SGAT issues will be adequately addressed by this process. The concern expressed in earlier workshops was a need to have all technical publications, product descriptions and other policy type documents brought into agreement with the SGAT, using a process which includes both ILEC and CLEC oversight. Whereas the CCIMP process does provide for CLEC involvement, I'm not certain that it provides sufficient opportunity to see that our concerns are adequately addressed, as it is only a 30 day process.

Q. WHAT OTHER CONCERNS DO YOU HAVE WITH THE CICMP PROCESS?

A. I am very concerned that the appropriate CLEC subject matter experts are not becoming involved in this process. The process calls for a single point of contact for each CLEC. While in an ideal world, this seems to be a logical approach. However, in the CLEC world, it just doesn't work. Many newer CLECs, such as Covad, have high employee turnover and have not developed stable processes that can assure the successful use of a single point of contact by Qwest. This fact has been born out by Covad's minimal knowledge of, and involvement with this process. Qwest must take all reasonable steps

necessary to ensure that all CLECs have an opportunity to participate in the CICMP process. At a minimum, all notices and documents related to this process need to be electronically provided to the Covad Qwest ILEC Relations contact for distribution to those in Covad who need to become involved.

Q. HAVE THE TECHNICAL PUBLICATIONS DISCUSSED IN THE WORKSHOPS COMPLETED THE CICMP PROCESS?

A. Qwest did represent that this would be done, but I have no personal knowledge that it was. I have also been unable to locate anyone at Covad who has any knowledge of these technical publications having completed the CICMP process.

Q. PLEASE DISCUSS YOUR CONCERNS RELATING TO IMPROPERLY REJECTED LSRs?

A. The most critical concern relating to improperly rejected LSRs is the resulting delay in our ability to provide service to our customers. This is the same basic issue discussed during the collocation workshop dealing with improperly rejected collocation requests. Qwest conditions processing of LSRs (SGAT 9.2.4.4) and collocation requests upon receiving a "complete and accurate" request but fails to clearly state the meaning of "complete and accurate" in the SGAT. This leaves the acceptance of the application totally at the discretion of Qwest.

Q. WHAT DO YOU CONSIDER AN "IMPROPERLY REJECTED" LSR?

A. I see two primary categories. The first would include all LSRs that were clearly “complete and accurate” but were rejected by Qwest totally in error for reasons unknown to Covad. The second category would include LSRs rejected for insignificant omissions or minor errors that could have been easily corrected by a simple phone call.

Q. ARE THESE IMPROPERLY REJECTED LSRs CAPTURED IN ANY PERFORMANCE MEASURE?

A. No. Performance Indicator Definition (PID) P04 captures rejected LSRs, however there is no measure that captures data on the number of LSRs rejected incorrectly by Qwest. Moreover, “rejected LSRs” – regardless of the basis for the rejection -- are excluded from the data that feed the PIDs. This is a significant issue for Covad because our ability to provision service to our customers in a timely manor is a core requirement for Covad to remain in business.

Q. WHAT STEPS SHOULD BE TAKEN BY QWEST TO RESOLVE THIS PROBLEM?

A. First, a PID needs to be developed that will accurately measure these “improperly rejected” LSRs. Next, Qwest and the CLECs must reach agreement on what constitutes a “complete and accurate” LSR. Finally, Qwest must be willing to assist CLECs by resolving minor LSR problems with a phone call, rather than requiring the costly and time consuming process of re-submitting the LSR in its entirety.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes, it does.

CERTIFICATE OF SERVICE

I, Anna Celaya, hereby certify that an original and ten (10) copies of the Rebuttal Testimony of Michael Zulevic on behalf of Covad Communications, in Docket No. T-00000A-97-0238, were sent for filing via overnight delivery on this 24th day of May, 2001, to the following:

Arizona Corporation Commission
Docket Control Utilities Division
1200 West Washington Street
Phoenix, AZ 85007-2996

and a true and correct copy of the foregoing was served via overnight delivery this 24th day of May, 2001, on the following:

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and a true and correct copy of the foregoing was sent via United States Mail, postage prepaid, on this 24th day of May, 2001, to the following:

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and a true and correct copy of the foregoing document was served electronically on May 24, 2001 to each person on the e-mail distribution list for this docket provided by Staff of the Arizona Corporation Commission.